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Attorneys for Plaintiff HEIDI GITTERMAN

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

HEIDI GITTERMAN, an individual

Plaintiff,

vs.

EXPERIAN INFORMATION

SOLUTIONS, INC., an Ohio corporation
 doing business as EXPERIAN; and DOES
 ONE through TEN, inclusive,

Defendants.

Case No.: 3:09-cv-05382-RS

**STIPULATION TO MODIFY CASE
 MANAGEMENT SCHEDULING ORDER;
 [PROPOSED] ORDER THEREON**

[Civil L.R. 6-1; 6-2; 7-12]

District Judge: Hon. Richard Seeborg

Courtroom: 3

The Plaintiff, HEIDI GITTERMAN ("Plaintiff" or "Gitterman"), by and through her attorneys of record, Shewry & Van Dyke, LLP, and the Defendant, EXPERIAN INFORMATION SOLUTIONS, INC. ("Experian"), by and through its attorneys, Jones Day, Plaintiff Heidi Gitterman ("Plaintiff") and Defendant Experian Information Solutions, Inc. ("Experian"), by and through their respective attorneys of record, hereby STIPULATE to modify the Court's Case Management Scheduling Order [Doc. Nos. 27 & 39] to extend the deadline for completion of non-expert discovery by sixteen (16) days, from May 14, 2011 to May 31, 2011. In anticipation of the Court's grant of this request, Experian has granted to Plaintiff a two-week extension of time within which to respond to Experian's written discovery requests.

The parties agree that good cause exists to extend the discovery deadline. After service by Experian in early March, 2011 of written discovery, Plaintiff's mother fell ill and thereafter passed

away. Due to the extreme emotional difficulties endemic in such situations, and other concomitant considerations, Plaintiff has been unable to fully participate in the preparation of responses during the time frames set forth under the Federal Rules of Civil Procedure. This current state of affairs was not one reasonably foreseeable by the parties or their counsel.

This is the second request of the parties to modify the Case Management Scheduling Order [See Doc. Nos. 38 & 39], adding a total of 74 days to the dates initially set forth in Doc. No. 27. The parties anticipate that all non-expert discovery will be concluded by June 6, 2011.

DATED: March 29, 2011

SHEWRY & VAN DYKE, LLP

By /s/ Christopher C. Saldaña
Christopher C. Saldaña, Esq.
Michelle L. Van Dyke, Esq.
Attorneys for Plaintiff HEIDI GITTERMAN

DATED: March 29, 2011

JONES DAY

By /s/ Eric J. Hardeman
Eric J. Hardeman, Esq.
Angela M. Taylor, Esq.
Attorneys for Defendant EXPERIAN
INFORMATION SOLUTIONS, INC.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/30/11


UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA